

COHEN, SEGLIAS, PALLAS,  
GREENHALL & FURMAN, PC  
Steven D. Usdin, Esquire  
Nella M. Bloom, Esquire (NB3891)  
30 South 17th Street, 19th Floor  
Philadelphia, PA 19103  
Tel: (215) 564-1700  
Fax: (215) 564-3066  
Email: susdin@cohenseglias.com  
nbloom@cohenseglias.com

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:  NEW JERSEY MOTORSPORTS PARK, LLC, Debtor	Chapter 11  Case No.
In re:  NEW JERSEY MOTORSPORTS PARK OPERATING COMPANY, LLC, Debtor	Chapter 11  Case No.
In re:  NEW JERSEY MOTORSPORTS PARK URBAN RENEWAL, LLC, Debtor	Chapter 11  Case No.
In re:  NEW JERSEY MOTORSPORTS PARK DEVELOPMENT ASSOCIATES, LLC, Debtor	Chapter 11  Case No.

**MOTION FOR ORDER (A) AUTHORIZING INTERIM AND PERMANENT USE OF CASH COLLATERAL AND GRANTING ADEQUATE PROTECTION PURSUANT TO 11 U.S.C. § 364(c); (B) SCHEDULING FINAL HEARING AND PRESCRIBING FORM AND MANNER OF NOTICE; AND (C) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that New Jersey Motorsports Park, LLC (“NJMP”), New Jersey Motorsports Park Operating Company, LLC (“Operating”), New Jersey Motorsports Park Urban Renewal, LLC (“Urban Renewal”), and New Jersey Motorsports Park Development Associates, LLC (“Development”) (collectively the “Debtors”) shall move before the Honorable

\_\_\_\_\_, United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, Courtroom \_\_\_, Camden, NJ 08101 on March \_\_\_, 2011 at \_\_\_\_\_ o'clock prevailing time, or as soon thereafter as counsel may be heard on their Motion for an Order (A) Authorizing Interim and Permanent Use of Cash Collateral and Granting Adequate Protection Pursuant to 11 U.S.C. § 364(c); (B) Scheduling Final Hearing and Prescribing Form and Manner of Notice; and (C) Granting Related Relief (the "Motion").

The Debtors will rely upon the attached Certification and waive oral argument unless timely opposition is submitted.

As the facts that the Debtors rely upon as set forth in the accompanying Certification and the bases for the Debtors' request as clearly set forth in the aforesaid "Local Rule" do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary to aid the Court in deciding the motion.

Objections should be filed with the Court and served upon the moving party prior to the date of the hearing.

**COHEN, SEGLIAS, PALLAS,  
GREENHALL & FURMAN, P.C.**

/s/ Nella M. Bloom

---

**Nella M. Bloom, Esquire**  
30 South 17<sup>th</sup> Street, 19<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 564-1700  
*Proposed Attorney for the Debtors*

Dated: March 7, 2011